

EXHIBIT T

(Redacted Portions Filed Under Seal)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

vs.

**TERRAFORM LABS PTE LTD. and
DO HYEONG KWON,**

Defendants.

No. 1:23-cv-1346 (JSR)

**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION’S
FOURTH AMENDED RULE 26(a) INITIAL DISCLOSURES**

Plaintiff Securities and Exchange Commission (“SEC”) makes these fourth amended initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) based upon the information that is currently reasonably available to it. The SEC reserves the right to supplement, correct, and/or amend these initial disclosures should the need arise.

I. Individuals Likely to Have Discoverable Information the SEC May Use to Support Its Claims (Rule 26(a)(1)(A)(i))

Pursuant to Rule 26(a)(1)(A)(i), Attachment A hereto lists the name and, if known, the last known address, telephone number, other contact information of each person likely to have discoverable information that the SEC may use to support its claims, and the subject matter of such information, unless the use would be solely for impeachment.

The subject matter of each person’s expected testimony may not capture all relevant and discoverable information held by the persons listed, and therefore should not be understood to limit the discovery that the SEC will take with respect to those persons. By indicating the general subject matter(s) of information that these individuals may possess, the SEC is also in no

way limiting its right to call any listed individual to testify concerning other subjects. The SEC's investigative files in this matter are voluminous and contain the names of other individuals who may have discoverable information that the SEC may use to support its claims and/or defenses. The SEC may also learn, during the course of discovery, of additional individuals with discoverable information that the SEC may use to support its claims and, if necessary, the SEC will identify any such individuals to Defendants.

In addition to those individuals specifically identified, the SEC incorporates by reference any witnesses and their possible subjects of testimony disclosed by Defendants as part of their Fed. R. Civ. P. 26(a)(1) disclosures. The SEC also likely will rely on summary witnesses, designated representatives, and/or records custodians of some or all of the listed organizations pursuant to Federal Rules of Civil Procedure and Evidence. The SEC may also call one or more expert witnesses. The SEC further notes that discovery in this case is ongoing, and accordingly reserves the right to amend and/or add to this list if additional witnesses with discoverable information become known.

II. Documents the SEC May Use to Support Its Claims (Rule 26(a)(1)(A)(ii))

Pursuant to Rule 26(a)(1)(A)(ii), Attachment B hereto contains a description of documents, electronically stored information, and tangible things that the SEC received during its investigation, or that are otherwise currently in its possession, custody, and control, that the SEC may use to support its claims. The SEC reserves the right to supplement this information as necessary. The documents described on Attachment B are located at the Commission's headquarters at 100 F Street, N.E., Washington, DC 20549.

III. Calculation of Requested Money Relief (Rule 26(a)(1)(A)(iii))

The SEC submits that Rule 26(a)(1)(A)(iii) is inapplicable to this civil enforcement proceeding because the SEC does not claim or seek damages. Instead, the SEC seeks various forms of equitable relief and remedial sanctions as authorized by statute.

IV. Insurance Agreements (Rule 26(a)(1)(A)(iv))

The SEC is not aware of any insurance agreements under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy the judgment.

V. No Waiver of Privilege and Reservation of Right to Amend and/or Supplement

The SEC does not intend to waive, and does not waive, any applicable privilege or protective doctrine over any other materials as a result of providing these disclosures, or as a result of the identification or production of any materials described herein. The SEC reserves the right to amend, supplement, or correct these initial disclosures as discovery progresses and if and when additional information becomes available.

Dated: October 2, 2023

/s/ Devon Staren

James P. Connor
Devon L. Staren
Laura E. Meehan
Carina Cuellar
Chris Carney
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U.S. Securities and Exchange Commission
100 F Street NE
Washington, DC 20549
Tel: (202) 551-5346
Email: starend@sec.gov

CERTIFICATE OF SERVICE

I certify that on October 2, 2023, I caused the foregoing to be served by email upon counsel of record:

Attorneys for Defendants Terraform Labs PTE Ltd. and Do Hyeong Kwon:

David Kornblau
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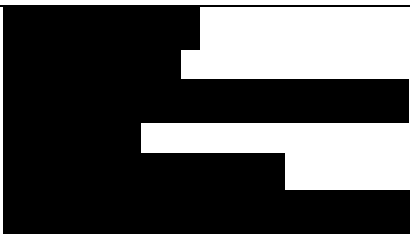
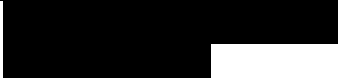
/s/ Devon Staren

*Securities and Exchange Commission v. Terraform Labs PTE Ltd., et. al.***ATTACHMENT A**
TO SEC'S FOURTH AMENDED RULE 26(a) INITIAL DISCLOSURES

NAME	LAST KNOWN ADDRESS OR COUNSEL CONTACT INFORMATION	SUBJECT MATTER
Do Kwon, Terraform Labs	[REDACTED]	<ul style="list-style-type: none"> All subjects relevant to the Complaint.
Terraform Labs	[REDACTED]	<ul style="list-style-type: none"> All subjects relevant to the Complaint.
[REDACTED]	[REDACTED]	[REDACTED]
Adam Wenig	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Alec Korman, Mechanism	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not limited to Chai.
Alex/Hyun-Joong Kim, Terraform Labs	[REDACTED]	<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra

		ecosystem, and the relationship between Chai and Terraform or the Terraform blockchain.
Altonomy		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to the distribution of Terraform crypto asset securities.
Andrew Kang, Mechanism		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Andy Han, Chai Corporation		<ul style="list-style-type: none"> Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Antithesis (Anonymous)		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not limited to the restoration of UST to \$1 in May 2021.
Apex Crypto		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to the distribution of Terraform crypto asset securities.
Arash Vakil		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Arjun Sethi, Tribe Capital Management		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not limited to Chai.

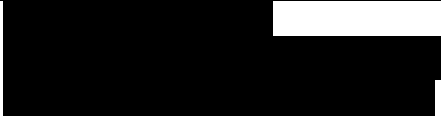


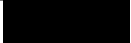

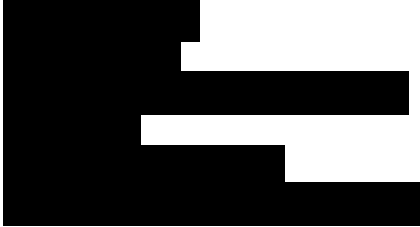
B2C2		<ul style="list-style-type: none"> Information related to Defendants' assets, transfers between accounts, and their disposition.
Baek Kim, Hashed		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors. Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Benjamin Huan, Jump Crypto		<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021.
Binance.com		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to Defendants' promotional efforts, the distribution of Terraform crypto asset securities, and trading by Terraform. Information related to Defendants' assets, transfers between accounts, and their disposition.
Binance.U.S		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to Defendants' promotional efforts, the distribution of Terraform crypto asset securities, and trading by Terraform.
Bittrex, Inc.		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to Defendants'

		promotional efforts, the distribution of Terraform crypto asset securities, and trading by Terraform.
Boris Revsin, Republic Capital Management		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not the restoration of UST to \$1 in May 2021.
Celsius		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Chainlink		<ul style="list-style-type: none"> Information related to the operations of Terraform protocols, including but not limited to the Mirror Protocol and the Terra blockchain.
Chee Lee		<ul style="list-style-type: none"> Information related to the operations of Terraform protocols, including but not limited to the Mirror Protocol and web apps for Terraform crypto assets.
Chris Amani, Terraform Labs		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, the Anchor Protocol, and the relationship between Chai and Terraform or the Terraform blockchain.
Chris Cushman		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.

CJ Han, Terraform Labs	[REDACTED]	<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, the Anchor Protocol, and the relationship between Chai and Terraform or the Terraform blockchain. Chai operations.
Coinbase	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to Defendants' promotional efforts, the distribution of Terraform crypto asset securities, trading by Terraform. Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors. Information related to Defendants' assets, transfers between accounts, and their disposition.
Coinlist	[REDACTED]	<ul style="list-style-type: none"> Information related to Defendants' assets, transfers between accounts, and their disposition.
Daniel Baek, Chai Corporation	[REDACTED]	<ul style="list-style-type: none"> Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Daniel Chen, OpenToken	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to Defendants' promotional efforts, and the distribution of Terraform crypto asset securities.
Daniel Hwang, Terraform Labs	[REDACTED]	<ul style="list-style-type: none"> Information about the business of Terraform, including but not





		limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Anchor Protocol, and the relationship between Chai and Terraform or the Terraform blockchain.
Daniel Shin, Chai Corporation		<ul style="list-style-type: none"> • Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, and the Anchor Protocol. • Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Dayeon Ahn, Chai Corporation		<ul style="list-style-type: none"> • Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Evan Kereiakes Terraform Labs		<ul style="list-style-type: none"> • Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, and UST.
Jose Maria Macedo, Delphi Digital		<ul style="list-style-type: none"> • Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors. • Information related to the operations of Terraform protocols, including but not limited to protocols for the Terraform ecosystem.



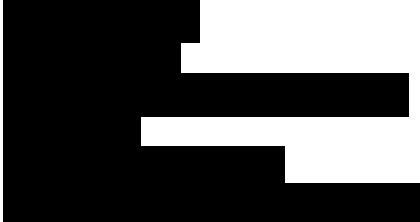


Etienne Napoleone, Terraform Labs	[REDACTED]	<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, the Anchor Protocol, and the relationship between Chai and Terraform or the Terraform blockchain.
FalconX	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to the distribution of Terraform crypto asset securities.
FTX Trading	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to the distribution of Terraform crypto asset securities.
Gemini Trust company LLC	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to the distribution of Terraform crypto asset securities.
Genesis	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
GiGi Kwon, Chai Corporation	[REDACTED]	<ul style="list-style-type: none"> Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain. Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, and UST.


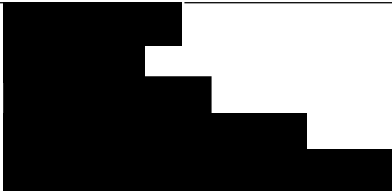

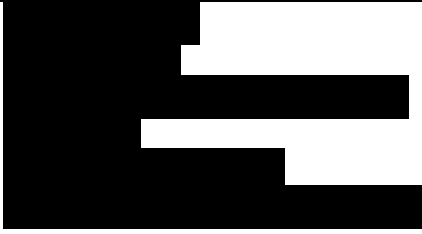
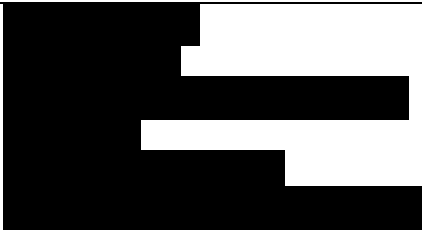
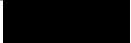
Hanju/Paul Kim, Terraform Labs/ Chai Corporation	 	<ul style="list-style-type: none"> • Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, and the Anchor Protocol. • Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Huobi Global Limited		<ul style="list-style-type: none"> • Defendants' offers and sales of crypto asset securities, including but not limited to Defendants' promotional efforts and representations to investors, • Defendants' distribution of Terraform crypto asset securities, and trading by Terraform.
HyungSuk Kang, Terraform Labs		<ul style="list-style-type: none"> • Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, and the Anchor Protocol.
Jane Street		<ul style="list-style-type: none"> • Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Jared Warn, Terraform Labs		<ul style="list-style-type: none"> • Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, and the Anchor Protocol.

Jason Ryterband	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Jeff Bezaire, Jump Crypto	[REDACTED]	<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021.
Jeff Fagnan, Accomplice Management, LLC	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not limited to the restoration of UST to \$1 in May 2021.
Jeff Kuan, Terraform Labs	[REDACTED]	<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, and the Anchor Protocol. Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Jihoon Kim, Terraform Labs/ Chai Corporation	[REDACTED]	<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, and the Anchor Protocol. Chai operations and the relationship between Chai and

		Terraform and/or the Terraform blockchain.
Joey Krug, Pantera		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Jonathan Kol, Galaxy Digital		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not limited to Chai.
Josh Suter, Jump Crypto		<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021.
Justin Chao		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Justin Hong, Terraform Labs/ Chai Corporation		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, and UST. Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Kanav Kariya, Jump Crypto		<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities

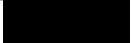

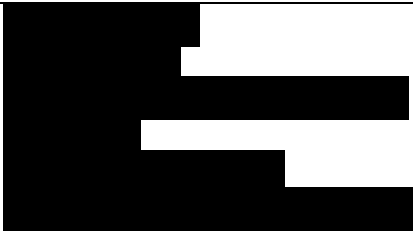

		<p>and the restoration of UST to \$1 in May 2021.</p> <ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Kevin Liu, Jump Crypto		<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021.
KuCoin Exchange		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to Defendants' promotional efforts, the distribution of Terraform crypto asset securities, and trading by Terraform. Information related to Defendants' assets, transfers between accounts, and their disposition.
Kyle Novak		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not limited to the restoration of UST to \$1 in May 2021.
Kysen Technologies		<ul style="list-style-type: none"> Information related to the operations of Terraform protocols, including but not limited to the Mirror Protocol, and web apps for Terraform crypto asset securities.
Lightspeed Management Company LLC		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.







Marco Di Maggio, Terraform Labs/Gaza Labs		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Anchor Protocol, and the relationship between Chai and Terraform or the Terraform blockchain.
Marius Cezar		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Matt Cantieiri, Terraform Labs		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, and the Anchor Protocol.
Matthew Hyde		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Michael Arrington, ArringtonXRP		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not limited to Chai. Information related to the operations of Terraform protocols, including but not limited to the Mirror Protocol, and the Terra blockchain. Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.


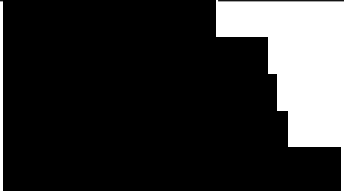



Michael Setrin, Jump Crypto		<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021.
Mike Novogratz, Galaxy Digital		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not limited to Chai.
Nader George		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Natalie Luu, Terraform Labs		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, and the Anchor Protocol.
Nate Hughes, Terraform Labs		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, and the Anchor Protocol.
Nicholas Platias, Terraform Labs/ Chai Corporation		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror

		<p>Protocol, and the Anchor Protocol.</p> <ul style="list-style-type: none"> Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Nicolas Andreoulis, Terraform Labs/ Chai Corporation		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, the Anchor Protocol, and the relationship between Chai and Terraform or the Terraform blockchain.
OKCoin and OKX		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to Defendants' promotional efforts, the distribution of Terraform crypto asset securities, and trading by Terraform. Information related to Defendants' assets, transfers between accounts, and their disposition.
ParaFi Capital LP		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Paul Guerra		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Paul Verradittakit, Pantera		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.

Payward Ventures, Inc. (d/b/a Kraken)	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to Defendants' promotional efforts and the distribution of Terraform crypto asset securities.
Poloniex, LLC (Circle Internet Financial, LLC)	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, including but not limited to the distribution of Terraform crypto asset securities.
Sherwin Dowlat, PolyChain	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Protocol Labs	[REDACTED]	<ul style="list-style-type: none"> Information related to the operations of Terraform protocols, including but not limited to protocols for Terraform ecosystem.
Rahul Abrol, Chai Corporation	[REDACTED]	<ul style="list-style-type: none"> Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Rick Benson, Jump Crypto	[REDACTED]	<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021.
Robot Manager LLC	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.



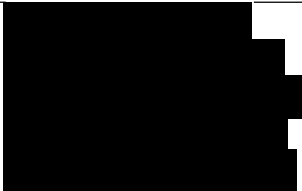

Sarah Kim, Terraform Labs		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, the Anchor Protocol, and the relationship between Chai and Terraform or the Terraform blockchain.
Simon Kim, Hashed		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not limited to Chai. Information related to the operations of Terraform protocols, including but not limited to protocols for Terraform ecosystem. Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
SJ Park, Terraform Labs		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, the Anchor Protocol, and the relationship between Chai and Terraform or the Terraform blockchain.
Spencer Noon		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.

Stanford Liu, Terraform Labs		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, the Anchor Protocol, and the relationship between Chai and Terraform or the Terraform blockchain.
Steven Lee, BlockTower		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not limited to Chai.
Tai Ping Shan Ltd.		<ul style="list-style-type: none"> Information related to Defendants' assets, transfers between accounts, and their disposition.
Takashi Fujishima, Jump Crypto		<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021.
Twitter		<ul style="list-style-type: none"> Information related to Defendants' twitter accounts.
Tyler Bennett		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors, including but not limited to Chai and the restoration of UST to \$1 in May 2021.

Jessie Walden, Variant Fund GP, LLC		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Victor Wang, HOF Capital		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors Information related to Defendants' assets, transfers between accounts, and their disposition.
Washington Nationals		<ul style="list-style-type: none"> Agreement with Terraform and Defendants' promotional efforts.
Will Chen, Terraform Labs/TerranOne		<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, the Anchor Protocol, and the relationship between Chai and Terraform or the Terraform blockchain.
William DiSomma, Jump Trading		<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021. Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.

Wook Hwang, Chai Corporation	[REDACTED]	<ul style="list-style-type: none"> Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Xiaoyue (Richard) Dai	[REDACTED]	<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Yun Yeo, Terraform Labs/Chai Corporation	[REDACTED]	<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, the Anchor Protocol. Chai operations and the relationship between Chai and Terraform and/or the Terraform blockchain.
Zion Schum, Terraform Labs	[REDACTED]	<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, the Anchor Protocol.
Kernal Labs Inc.	[REDACTED]	<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development.
Gaza Labs Inc.	[REDACTED]	<ul style="list-style-type: none"> Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development.

Additional Investors in Terraform crypto assets that may be identified		
Custodians of Record for entities that provided documents		
Any witness identified in Defendants' Initial Disclosures		
[REDACTED]	[REDACTED]	[REDACTED]
Mike Carney, Washington Nationals	[REDACTED]	<ul style="list-style-type: none"> • Agreement between the Washington Nationals and Terraform and Defendants' promotional efforts.
Brian Curran Terraform Labs	[REDACTED]	<ul style="list-style-type: none"> • Information about the business of Terraform, including but not limited to offers and sales of crypto asset securities, Defendants' promotional efforts, business development, the Terra ecosystem, Luna, UST, the Mirror Protocol, and Anchor Protocol. • Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021.

Karthik Raju, PolyChain		<ul style="list-style-type: none"> Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Brandon Ackley, Jump Trading		<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021. Defendants' offers and sales of crypto asset securities, their promotional efforts, and representations made to investors.
Keone Hon, Jump Trading		<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021.
Ryan Katzman, Jump Trading		<ul style="list-style-type: none"> Business relationship between Jump and Terraform, including but not limited to loan agreements and modifications, trading of Terraform crypto asset securities and the restoration of UST to \$1 in May 2021.

Securities and Exchange Commission v. Terraform Labs PTE, Ltd., et. al.

ATTACHMENT B
TO SEC'S FOURTH AMENDED RULE 26(a) INITIAL DISCLOSURES

1. Accomplice Management, LLC
Description: Email communications and attachments, and corporate records
Bates Ranges: ACCMGMT00000001 to ACCMGMT00012117; SEC-ACCOMPLICE-E-0000001 to SEC-ACCOMPLICE-E-0000002
2. Altonomy Holdings Pte, Ltd
Description: Account and trading records, and corporate records
Bates Ranges: Altonomy_0000001 to Altonomy_0000042; SEC-AHPL-E-0000001 to SEC-AHPL-E-0000004
3. Airlines Reporting Corporation
Description: Travel records
Bates Ranges: SEC-ARC-E-0000001 to SEC-ARC-E-0000006
4. Chris Amani, Matthew Cantieri, William Chen, Natalie Luu, SJ Park, Zion Schum, and Jaren Warn
Description: Chats, and corporate records
Bates Ranges: TFL_EMP_00000001 to TFL_EMP_00057164; SEC-AmaniC-E-0000001 to SEC-AmaniC-E-0000004; SEC-CantieriM-E-0000001 to SEC-CantieriM-E-0000004; SEC-LuuN-E-0000001 to SEC-LuuN-E-0000004; SEC-ParkS-E-0000001 to SEC-ParkS-E-0000004; SEC-SchumZ-E-0000001 to SEC-SchumZ-E-0000004; SEC-WarnJ-E-0000001 to SEC-WarnJ-E-0000004, SEC-KobreKim-E-0000003 to SEC-KobreKim-E-0000012
5. Antithesis
Description: information and communications related to investment
Bates Ranges: SEC-ANTITHESIS-E-0000001 to SEC-ANTITHESIS-E-0000065
6. Apex Crypto, LLC
Description: Account and trading information
Bates Ranges: APEXCRYPTO_SEC_0000001 to APEXCRYPTO_SEC_0000003; APEXCRYPTO_SEC_0001 to APEXCRYPTO_SEC_0004
7. ArringtonXRP Capital Fund, L.P.
Description: Email communications and attachments, chats, and corporate records
Bates Ranges: AXRP00001 to AXRP0131371; SEC-AXRP-E-0000001 to SEC-AXRP-E-0000034

8. B2C2 Exchange

Description: Account and trading records

Bates Ranges: SEC-B2C2-E-0000001 to SEC-B2C2-E-0000085

9. BAM Trading

Description: Account and trading information

Bates Ranges: SEC-BAM-E-0000001 to SEC-BAM-E-0000036; SEC_HO-14164_000001 to SEC_HO-14164_000006

10. Binance Holdings

Description: Account and trading information

Bates Ranges: SEC-BINANCEH-E-0000001 to SEC-BINANCEH-E-0000040; BHL-SEC-MIRROR-0000001 to BHL-SEC-MIRROR-0000002

11. Bittrex

Description: Email communications and attachments, chats, account and trading information, and corporate records

Bates Ranges: Bittrex-HO-14164-0000001 to Bittrex-HO-14164-0000858; SEC-BITTREX-E-0000001 to SEC-BITTREX-E-0000007

12. BlockTower Capital Advisors, LP

Description: Email communications and attachments, and corporate records

Bates Ranges: BCA-MP-01-00000001 to BCA-MP-01-00202379; BCA-MC-00-03 to BCA-MC-00-20

13. BNY Mellon

Description: Bank Records

Bates Ranges: SEC-BNYM-E-0000001 to SEC-BNYM-E-0000003

14. Chen, Daniel (Open Token)

Description: Email communications and attachments, chats, agreements, and corporate records

Bates Ranges: D.CHEN FOIA REQUEST BATES NO. 002-000001 to D.CHEN FOIA REQUEST BATES NO. 002-001455; SEC-ChenD-E-0000001 to SEC-ChenD-E-0001660

15. Circle Poloniex

Description: Account and trading records

Bates Ranges: SEC-POLONIEX-E-0000001 to SEC-POLONIEX-E-0000145

16. Coinbase

Description: Email communications and attachments, chats, account and trading information, and corporate records

Bates Ranges: CB_MIRROR_00000001 to CB_MIRROR_00001205; COIN-HO-14164_0000001 to COIN-HO-14164_0001770; SEC-COINBASE-E-0000001 to SEC-COINBASE-E-0000016

17. CoinList

Description: Account and trading information

Bates Ranges: SEC-COINLIST-E-0000001 to SEC-COINLIST-E-0000258

18. Dai, Richard

Description: Email communications and attachments, and chats

Bates Ranges: Dai_SEC_Mirror_0000001 to Dai_SEC_Mirror_0000202; SEC-DaiR-E-0000001 to SEC-DaiR-E-0000002

19. Deel, Inc.

Description: Email and other communications, employee agreements and payment records, and corporate records

Bates Ranges: Deel_SEC_000001 to Deel_SEC_002503; SEC-DEEL-E-0000001 to SEC-DEEL-E-0000002

20. Delphi Digital Consulting

Description: Email communications and attachments, chats, and corporate records

Bates Ranges: DDC0000001 to DDC0001716; SEC-DDC-E-0000001 to SEC-DDC-E-0000002; SEC-HO-14164-E-0002133 to SEC-HO-14164-E-0002134

21. DiMaggio, Marco

Description: Email communications and attachments, research, and corporate records

Bates Ranges: DiMaggio0000001 to DiMaggio0013659

22. FalconX Exchange

Description: Account and trading information, and corporate records

Bates Ranges: SEC-FALCONX-E-0000001 to SEC-FALCONX-E-0000791; SEC-FALCONXEX-E-0000001 to SEC-FALCONXEX-E-0000625

23. FatManTerra

Description: Chats, publicly available information, and other materials

Bates Ranges: SEC-HO-14164-E-0000218 to SEC-HO-14164-E-0002086, SEC-HO-14164-E-0002135

24. FTX Trading

Description: Trading and account information

Bates Ranges: SEC-FTXTRADING-E-0000001 to SEC-FTXTRADING-E-0000230

25. FTX US

Description: Letter

Bates Ranges: SEC-FTXUS-E-0000001 to SEC-FTXUS-E-0000002

26. Galaxy Digital

Description: Email communications and attachments, chats, and corporate records

Bates Ranges: GD_MIR00000001 to GD_MIR00094518; SEC-GD-E-0000001 to SEC-GD-E-0000033

27. Gemini Trust Company

Description: Account and trading information, and communications

Bates Ranges: SEC-GEMINI-E-0000001 to SEC-GEMINI-E-0000176

28. Genesis Global Trading

Description: Email communications and attachments, trading information, and corporate records

Bates Ranges: Genesis_Mirror_SEC_0000001 to Genesis_Mirror_SEC_0000483; SEC-GGT-E-0000001 to SEC-GGT-E-0000038

29. Github

Description: Account information and information from repositories

30. Google

Description: Account information and communication header information

31. Hashed International LLC

Description: Email communications and attachments, chats, and corporate records

Bates Ranges: HASHEDINC0000001 to HASHEDINC0014603; SEC-HASHED-E-0000001 to SEC-HASHED-E-0000002

32. HOF Capital

Description: Email communications and attachments, and corporate records

Bates Ranges: HOF00000001 to HOF00010080

33. Huobi

Description: Account and trading information

Bates Ranges: SEC-HG-E-0000001

34. IDEO

Description: Email communications and attachments, and corporate records

Bates Ranges: IDEO000001 to IDEO000241; SEC-IDEO-E-0000001 to SEC-IDEO-E-0000430

35. Jane Street Capital

Description: Email communications and attachments, chats, corporate records
Bates Ranges: JaneStreet00000001 to JaneStreet00079198; SEC-JSC-E-0000001 to SEC-JSC-E-0000025

36. Jump Trading and Tai Mo Shan Limited

Description: Email communications and attachments, chats, trading records and information, corporate records
Bates Ranges: JUMP0000001 to JUMP0213226; SEC-JUMPTRADE-E-0000001 to SEC-JUMPTRADE-E-0023074

37. Kuan, Jeffery

Description: Chats, and corporate records
Bates Ranges: HO-14164_JK_00001 to HO-14164_JK_13114

38. Kucoin Exchange

Description: Account and trading information
Bates Ranges: SEC-KE-E-0000001 to SEC-KE-E-0000018

39. Kysen Technologies

Description: Email communications and attachments, chats, and corporate records
Bates Ranges: KT000001 to KT003902; KT 0000001 to KT 0000012

40. Lee, Chee

Description: Email communications and attachments, chats, and corporate records
Bates Ranges: CL 0000001 to CL 0001593; SEC-LeeC-E-0000001 to SEC-LeeC-E-0000001

41. Lightspeed

Description: Email communications and attachments, and corporate records
Bates Ranges: LIGHTSPEED0000001 to LIGHTSPEED0001120

42. Monetary Authority of Singapore

Description: Business records, certifications, transcripts and exhibits

43. [REDACTED]

Description: Publicly available information, emails and attachments, chats and other communications, and other materials

44. Noon, Spencer

Description: Email communications and attachments, chats, and MIR investment materials

Bates Ranges: Noon_SEC_Mirror_0000001 to Noon_SEC_Mirror_0000158; SEC-NoonS-E-0000001 to SEC-NoonS-E-0000002

45. OKX

Description: Account and trading information

Bates Ranges: SEC-OKX-E-0000001 to SEC-OKX-E-0000013

46. Pantera Advisors

Description: Email communications and attachments, chats, and corporate records

47. ParaFi Capital

Description: Email communications and attachments, chats, and corporate records

Bates Ranges: PARAFI-MIRROR-0000001 to PARAFI-MIRROR-0007240; SEC-PC-E-0000001 to SEC-PC-E-0000008

48. Payward Ventures (d/b/a Kraken)

Description: Email communications, and attachments, account and trading information, and corporate records

Bates Ranges: SEC-KRAKEN-E-0000001 to SEC-KRAKEN-E-0000222; PAYWARD_000001 to PAYWARD_000063; SEC-PVI-E-0000001 to SEC-PVI-E-0003462

49. Polychain Capital LP

Description: Email communications and attachments, chats, and corporate records

Bates Ranges: POLY-Cover-001 to POLY-Cover-062; POLY10000001 to POLY10156177; POLY-SEC-007 to POLY-SEC-018

50. Protocol Labs

Description: Emails, and corporate records

Bates Ranges: PL_MIR_000001 to PL_MIR_000299; SEC-PROTOCOL-E-0000001 to SEC-PROTOCOL-E-0000002

51. Republic Capital Advisors

Description: Email communications and attachments, chats, and corporate records

Bates Ranges: RCAP.APR.8.22.00001 to RCAP.APR.8.22.00236; RCAP.APR.22.22.00001 to RCAP.APR.22.22.00041; RCAP.MAY.16.22.00001 to RCAP.MAY.16.22.14544; RCAP.OCT.12.22.0014545 to RCAP.OCT.12.22.0014549; SEC-RCA-E-0000045 to SEC-RCA-E-0000048

52. Robot Manager

Description: Email communications and attachments, and chats

Bates Ranges: RM_SEC_0000001 to RM_SEC_0000095

53. Smart Contract

Description: Email communications and attachments, chats, and corporate records
Bates Ranges: SCI_00000001 to SCI_00000167; SEC-SMARTCON-E-0000001 to SEC-SMARTCON-E-0000003

54. Sygnum

Description: Emails, and bank records

55. Terraform Labs

Description: Email communications and attachments, chats, and corporate records
Bates Ranges: TFL_00000001 to TFL_0017144; SEC-TFL-E-0000001 to SEC-TFL-E-0000002, SEC-MAS-E-0000059 to SEC-MAS-E-0000074

56. Three Arrows Capital

Description: Email communications and attachments, and corporate records
Bates Ranges: 3AC-SEC-00000001 to 3AC-SEC-00009130; SEC-TAC-E-0000001 to SEC-TAC-E-0000628

57. Tribe Capital

Description: Email communications and attachments, and corporate records
Bates Ranges: TRIB00000001 to TRIB00004237

58. Twitter

Description: Account information
Bates Ranges: SEC-TWITTER-E-0000001 to SEC-TWITTER-E-0000918

59. Uniswap Labs

Description: Letter
Bates Ranges: SEC-UNISWAPLABS-E-0000001 to SEC-UNISWAPLABS-E-0000007

60. Variant Fund

Description: Email communications and attachments, chats, and corporate records
Bates Ranges: Variant_SEC_Mirror_0000001 to Variant_SEC_Mirror_0005732; SEC-VARIANT-E-0000001 to SEC-VARIANT-E-0000002

61. Washington Nationals

Description: Email communications and attachments, chats, and corporate records
Bates Ranges: WASHINGTON_NATIONALS_SEC_0000001 to WASHINGTON_NATIONALS_SEC_0004197

62. Testimony transcripts and exhibits related to investigative testimony conducted by the SEC staff during the SEC's investigation of the conduct alleged in the above-reference case.

63. Documents, electronically stored information, or tangible things obtained from the internet or commercial/public databases consisting of or reflecting: (a) certain press releases and news stories; and (b) recordings of statements by Defendants, their representatives, and others, transcripts thereof obtained by SEC staff, and related web capture information.
64. Additional documents the SEC is seeking pursuant to outstanding requests with Foreign Regulators, including the Monetary Authority of Singapore and the Swiss Financial Market Supervisory Authority.
65. Any additional documents the SEC produces in discovery.